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Reply to: Oakland Office

October 29, 2015

**VIA ECF**

Honorable James B. Clark, III, U.S.M.J.  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street, Room PO 01  
Newark, NJ 07101

Re: *Abdelmonem, et al. v. Buona Fortuna Inc., et al.*  
Civil Action No. 13-cv-3070 (CCC)(JBC)

Dear Judge Clark:

The parties in the above-referenced matter submit this joint letter requesting a telephone status conference and an adjournment of the Settlement Conference presently scheduled for November 9, 2015. After conferring with our client in advance of this conference, we determined that it was essential to depose certain additional individuals in order to calculate our settlement position. We also discussed this with Plaintiffs' Counsel, who consented to our request.

Defendants have advised Plaintiffs of four additional Plaintiffs, whose depositions are essential to our evaluation and construction of a meaningful settlement proposal. The parties have agreed on November 16, 2015 as a mutually available date to begin the depositions. Plaintiffs are currently determining witness availability.

In accordance with the foregoing, the parties respectfully request a 30 day extension of all present discovery deadlines. We would appreciate the opportunity of a brief telephonic status conference to address the Court's questions or concerns.

The parties appreciate Your Honor's attention to this matter. Should Your Honor have any

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questions regarding this submission, please feel free to contact the undersigned at any time.

Respectfully submitted,

s/ Richard A. Gantner

Richard A. Gantner

cc: All Counsel via ECF  
Joseph McMahon, Esq.  
Vincent Amen  
Frank Amen

SO ORDERED

s/James B. Clark

James B. Clark, U.S.M.J.

Date: 11/5/15

\* The settlement conference is adjourned to December 16, 2015 at  
2:00 p.m.